



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

December 9, 2019

Mr. David Howe
Chief Operating Officer
Cosmed Group, Inc.
28 Narragansett Avenue
Jamestown, RI 02835

Dear Mr. Howe:

Pursuant to section 114 of the Clean Air Act (CAA), the U.S. Environmental Protection Agency (EPA) is collecting information related to hazardous air pollutant emissions at ethylene oxide (EtO) commercial sterilization facilities to inform its review of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for this sector. As part of this effort, the EPA requires your assistance in providing information related to these emissions. If Cosmed Group, Inc. has previously provided information, the EPA appreciates your cooperation. However, in order to support an effective rulemaking, more information will be required.

We are requesting information regarding EtO commercial sterilization operations at the facilities specifically listed below and wholly owned by Cosmed Group, Inc., as well as any EtO commercial sterilization facilities wholly owned by Cosmed Group, Inc. that are not included on this list:

Facility	Street Address	City	State
Cosmed	19 Park Drive	Franklin	NJ
ETO Sterilization - Plant #2	2500 Brunswick Avenue East	Linden	NJ
Cosmed	2205 East 33rd Street	Erie	PA

The request is a survey in Microsoft® Excel format. We request that you complete and return the survey by February 6, 2020. Please download the spreadsheet and Instructions Document at: <https://www.epa.gov/stationary-sources-air-pollution/ethylene-oxide-emissions-standards-sterilization-facilities>. If there is a facility on this list not wholly owned by Cosmed Group, Inc., please indicate that in the response letter. A completed survey is not required for that facility.

This section 114 request is designed to collect information on emissions from EtO sterilization operations, including sterilization chamber vents, aeration room vents, chamber

exhaust vents, and fugitive emissions¹ at the facilities. The Instructions Document contains a summary of the instructions for completing and submitting responses to this survey request.

The survey request is designed to collect emissions information, which by law cannot be confidential business information (CBI). Submit the requested information to the EPA according to the instructions provided in Section 4 of the Instructions Document. **You are required to return all requested information to the EPA on or before the schedule due date specified in this letter.**

Supplemental information is contained in the following enclosures:

Description	Enclosure #
EPA's Information Gathering Authority Under Section 114 of the Clean Air Act	Enclosure 1
Disclosure of Emissions Data Claimed as Confidential Under Sections 110 and 114(c) of the Clean Air Act	Enclosure 2
Summary of Procedures for Safeguarding Clean Air Act Confidential Business Information	Enclosure 3
Designation of RTI International as Authorized Representative	Enclosure 4

This request is one step in an established public process for collecting foundational information as part of NESHAP reviews. The public and stakeholders will continue to have an opportunity to comment on the EtO commercial sterilization NESHAP review in the future, including a formal notice-and-comment period on any proposed action.

If you have questions regarding this survey, please contact Jonathan Witt in the EPA's Fuels and Incineration Group at 919-541-5645 or witt.jon@epa.gov.

Thank you for your assistance in this effort. The data will provide comprehensive information about the EtO commercial sterilization source category, which will lead to more effective rulemaking.

Sincerely,



Penny Lassiter
Division Director
Sector Policies and Programs Division

4 Enclosures

cc: Peter D. Lopez, Regional Administrator, U.S. EPA Region 2
Cosmo Servidio, Regional Administrator, U.S. EPA Region 3

¹ Defined as emissions of EtO which are not routed through the existing control equipment

John Filippelli, U.S. EPA Region 2

Cristina Fernandez, U.S. EPA Region 3

Francis Steitz, New Jersey Department of Environmental Protection

Craig Evans, Pennsylvania Department of Environmental Protection

Susan Foster, Pennsylvania Department of Environmental Protection